

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE APPLICATION OF ANTONIO DEL
VALLE RUIZ AND OTHERS FOR AN
ORDER TO TAKE DISCOVERY FOR USE
IN FOREIGN PROCEEDINGS PURSUANT
TO 28 U.S.C. § 1782

Case No. 1:18-mc-00085-ER

CORPORATE DISCLOSURE STATEMENT OF SANTANDER BANK N.A.

Pursuant to Federal Rule of Civil Procedure 7.1 Santander Bank N.A. certifies that:

1. Santander Bank, N.A. has no shareholders other than Santander Holdings U.S.A., Inc. and Independence Community Bank Corporation, which itself has no shareholders other than Santander Holdings U.S.A., Inc.

2. Santander Holdings U.S.A., Inc. is ultimately a wholly owned subsidiary of Banco Santander, S.A. It is not otherwise affiliated with any other publicly traded company, and no other publicly traded company owns 10% or more of its stock.

3. Banco Santander, S.A. is a publicly traded company and has no parent company. As of December 31, 2017, the only shareholder appearing on Banco Santander, S.A.'s register of shareholders with a stake of 10% or more was State Street Bank & Trust Company, which held approximately 13.32% of the company's common stock. Banco Santander, S.A. believes that those shares are held in custody in the name of third parties. To the best of Banco Santander, S.A.'s knowledge, none of those third parties itself holds a stake of over 3% in the company's shares.

Dated: March 8, 2018

Respectfully submitted:

/s/ Joseph J. Saltarelli

HUNTON & WILLIAMS LLP

Joseph J. Saltarelli

200 Park Avenue

New York, New York 10166

Telephone: (212) 319-1000

Facsimile: (212) 319-1100

Samuel A. Danon (to be admitted *pro hac vice*)

Gustavo J. Membiela (to be admitted *pro hac vice*)

1111 Brickell Avenue, Suite 2500

Miami, Florida 33131

Telephone: (305) 810-2500

Facsimile: (305) 810-2460

Counsel for Proposed Intervenors

*Banco Santander S.A., Santander Holdings U.S.A.,
Inc., and Santander Bank, N.A.*